



August 6, 2003

The purpose of these replacement pages is to reflect the changes associated with the comparison of the analytical data to the RFCA Modification including Wildlife Refuge Work and Ecological Receptor action levels

For the document entitled,
"Data Summary for IHSS Groups 900-2,"
issued in June 2003, please replace the former **Page 2** with the one provided herein. This page replacement reflects clarification as follows

- IHSS 153 has not impacted the Mound & East Trenches Plumes
- Ecological receptor exceedance will be addressed as part of the CRA

If you have any questions, please contact either Marla Broussard at x6007 or Karen Griggs at x4743
Thank you



Screen 3 – Does subsurface soil radiological contamination exceed criteria in Section 5.3 and Attachment 14?

No

Screen 4 – Is there an environmental pathway and sufficient quantity of COCs that would cause exceedance of the surface water standard (SWS)?

Contamination migration via erosion and groundwater are the two possible pathways whereby surface water could become contaminated by IHSSs 153 and 154. Based on the review of Figure 1 in Attachment 5 of the RFCA Modification (DOE, et al 2003), IHSSs 153 and 154 are not located in an area prone to landslides or high erosion. Consequently, surface water contamination via erosion can be eliminated.

Groundwater flow in the area is to the east-northeast towards South Walnut Creek located approximately 600 feet northeast. Groundwater monitoring results from well 01791, approximately 50 feet east of IHSS 153, were collected between December 1991 and March 1995. The results from this well do not indicate analytes at concentrations greater than RFCA groundwater Tier I ALs.

Based on the groundwater concentrations and gradient, it appears unlikely that IHSS 153 has contributed to the Mound and East Trenches VOC plumes. In addition, two groundwater monitoring wells (91103 and 91203) are planned downgradient of this IHSS Group per the Integrated Monitoring Plan (IMP).

Screen 5 – Are COC concentrations below Table 3 Action Levels for Ecological Receptors?

All COC concentrations are below the ALs for Ecological Receptors except for arsenic. Arsenic exceeds the Ecological Receptor AL of 2.15 mg/kg in five locations at depths from 2.5 feet to 8.5 feet bgs. Four of the locations are located in IHSS 154. The background value for arsenic is 13.14 mg/kg and the analytical results range from 14.9 mg/kg to 55.1 mg/kg with an average of 25.66 mg/kg. The Ecological Receptor exceedance will be addressed as part of the Comprehensive Risk Assessment (CRA).

Analytical results and the above Subsurface Soil Risk Screen indicate that an NFAA is justified for IHSS Group 900-2. Approval of this Data Summary Report constitutes regulatory agency concurrence of this IHSS Group as an NFAA. This information and NFAA determination will be documented in the FY03 Historical Release Report (HRR).